



U.S. Department of Justice

*United States Attorney
Western District of Tennessee*

*800 Federal Office Building Ph: (901) 544-4231
Memphis, Tennessee 38103 Fax: (901) 544-4230*

July 6, 2010

Ms. Kathryn H. Bowman
Parrish & Shaw
775 Ridge Lake Blvd., Suite 145
Memphis, Tennessee 38120

Re: *United States v. Johnnie Williams*
Cr. No. 10-20174-JPM

Dear Ms. Bowman:

This is to confirm receipt of your letter dated June 22, 2010 requesting discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure. In response thereto, please be advised of the following:

1. Pursuant to Rule 16(a)(1)(A), the defendant provided statements to law enforcement. The statements are summarized in the enclosed materials.
2. Pursuant to Rule 16(a)(1)(B), the defendant did not provide any written or recorded statements to law enforcement other than those summarized in the enclosed materials.
3. Pursuant to Rule 16(a)(1)(C), the United States does not consider the defendant an organization for purposes of this subsection.
4. Pursuant to Rule 16(a)(1)(D), a copy of the defendant's criminal history is enclosed.
5. Pursuant to Rule 16(a)(1)(E), the enclosed materials include numerous documents responsive to the rule.
6. Pursuant to Rule 16(a)(1)(F), the enclosed materials include a Comprehensive Environmental Response, Compensation and Liability Act Emergency Response Report that includes materials related to scientific testing.

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7. Pursuant to Rule 16(a)(1)(G), the United States will make the defendant aware of the expert witnesses it intends to call at trial, as well as a written summary of the expert's testimony, once the government determines what experts it intends to call at trial.

You are entitled to see the original paperwork and items of tangible evidence upon contacting this office.

The United States is cognizant of its obligations pursuant to Brady v. Maryland, 373 U.S. 88 (1968) and Rule 404(b) of the Federal Rules of Evidence.

The government requests any and all reciprocal discovery to which it is entitled pursuant to Rule 16 of the Federal Rules of Criminal Procedure and applicable case law. Please consider this request for reciprocal discovery a continuing request.

Please feel free to contact me if you have any questions concerning discovery in this matter.

Sincerely,

LAWRENCE J. LAURENZI
United States Attorney

By: /s/ John D. Fabian
John D. Fabian
Assistant United States Attorney
167 North Main, Suite 800
Memphis, Tennessee 38103
(#0075495, Ohio)

JDF

Encl.

cc: U.S. District Court Clerk (w/o enclosures)